

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GIUSEPPE MAROTTA et al.,

Plaintiff

v.

SUFFOLK COUNTY,

Defendant

C.A. NO. 05-10032-MEL

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)
PROPOSED JOINT SCHEDULING MANAGEMENT PLAN**

1. Proposed by Plaintiff and Defendant:

Automatic Document Disclosure under Local Rule 26.2(A) shall be made by exchange of pertinent documents no later than March 31, 2006.

2. Proposed by Plaintiff and Defendant:

The parties will serve their written discovery requests, exclusive of Requests for Admissions, on or before April 30, 2006.

3. Proposed by Plaintiff and Defendant:

The parties will complete all depositions of fact witnesses, including Rule 30(b)(6) witnesses, by July 31, 2006.

4. Proposed by Plaintiff and Defendant:

Dispositive motions shall be filed by September 30, 2006. Oppositions to Summary Judgment Motions will be due four (4) weeks after the Motion is filed. Reply Briefs will be due two (2) weeks thereafter.

5. Proposed by Plaintiff and Defendant:

The Plaintiff will provide disclosure of non-damages experts in accordance with Fed.R.Civ.P 26(a)(2) by October 31, 2006. The Defendant will provide disclosure of non-damages experts in accordance with Fed.R.Civ.P 26(a)(2) by November 30, 2006.

6. Proposed by Plaintiff and Defendant:

The parties propose that a trial by jury be scheduled for February 1, 2007.

7. Proposed by Plaintiff and Defendant:

The parties do not consent at the present time to trial before a Magistrate Judge.

Respectfully submitted,

THE PLAINTIFF

By his attorney,

[s/Daniel W. Rice](#)

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THE DEFENDANT

By its attorney,

s/James M. Davin

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Dated: November 14, 2005